

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAHAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS, J.
TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of THE HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

EXHIBIT 2

DECLARATION OF REP. WALLACE H. JORDAN, JR.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAJAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS, J.
TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of THE HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

**DECLARATION OF
REP. WALLACE H. JORDAN, JR.**

REP. WALLACE H. JORDAN, JR. hereby declares the following to be true under penalty of perjury under 28 U.S.C. § 1746:

1. I am competent to testify to and have personal knowledge of the matters stated in this declaration. As to those matters stated on information and belief, I believe them to be true.

2. I was elected to the South Carolina House of Representatives in 2015 as a Representative for District 63, which is located in Florence County, South Carolina.

3. In my capacity as a Representative, I currently serve as Chair the Ethics Committee of the South Carolina House of Representatives (“the Ethics Committee”).

4. I make this affidavit on behalf of myself and the members of the Ethics Committee, J. David Weeks, Beth E. Bernstein, Paula Rawl Calhoun, Micajah P. Caskey, IV, Neil A. Collins, John Richard C. King, Robby Robbins, J. Todd Rutherford, and Leonidas E. Stavrinakis, each of

whom has been sued individually in his/her official capacity (collectively "Defendants") in this matter.

5. Among the responsibilities of the Ethics Committee is to ensure orderly elections.

6. This is done, primarily, through enforcement of the South Carolina Ethics Act (S.C. CODE ANN §§ 8-13-100 *et seq.*) and related lobbying statutes (S.C. CODE ANN §§ 2-17-5 *et seq.*).

7. The above-referenced statutes were passed, among other things, to increase transparency into elections, hold donors and fundraisers accountable, and prevent corruption or the appearance thereof.

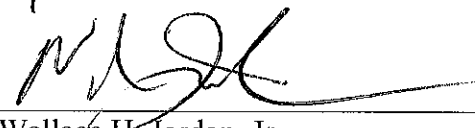
8. These are important and legitimate interests of the State of South Carolina.

9. As of the date of this declaration, the Ethics Committee has not been asked by any Member of the House of Representatives to issue an advisory opinion regarding the South Carolina Freedom Caucus.

10. As of the date of this declaration, I am not aware of any complaint, investigation, or enforcement action by the Ethics Committee related to the South Carolina Freedom Caucus or any of its members.

11. As of the date of this declaration, I am not aware of any criminal referrals, reprimands, other sanctions by the Ethics Committee related to the South Carolina Freedom Caucus or any of its members for any of the statutes at issue in the Complaint.

Signed under penalty of perjury this 27th day of April, 2023.



Wallace H. Jordan, Jr.